

## **REMARKS**

Claims 1-30 remain pending in the application. Claims 1, 9, 12, 16, 25, 28, 29, and 30 have been amended.

### **35 U.S.C. § 102(b) Rejection:**

Claims 1-30 were rejected under 35 U.S.C. § 102(b) as being anticipated by Foth, U.S. Patent 5,867,648. Applicant respectfully traverses this rejection.

**The cited reference does not teach or suggest all of the elements of the independent claims.** Foth teaches a connectivity scheme for heterogeneously coupling computer systems of dissimilar architectures, such as a client/server system to a mainframe system, using a high speed, low overhead protocol. The connection uses a channel-to-channel protocol, such as a Bus and Tag connection or ESC on connection. The scheme allows mainframe systems, particularly non-IBM and non-IBM plug compatible mainframes, to communicate with each other and with IBM and IBM plug compatible mainframes over the same high speed interfaces using large block sizes. Thus, the scheme provides non-IBM and non-IBM plug compatible mainframes to appear as peers in a channel-to-channel network.

In contrast, Applicant's independent claim 1 recites, in pertinent part:

“A storage system, comprising ... an interface adapter ... wherein the interface adapter further includes a state machine comprising a software emulation layer, wherein the software emulation layer comprises one or more software routines configured to operate as an emulation layer between the host interface and the storage device interface” (Emphasis added)

Independent claims 16, 28, 29, and 30 recite similar combinations of features.

Foth does not teach or suggest this combination of features. In particular, Applicant can find no teaching or suggestion of a state machine comprising a software

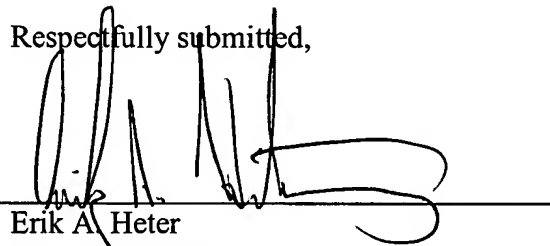
emulation layer as recited in the independent claims. Accordingly, Applicant submits that the standard for anticipation has not been met. Removal of the 35 U.S.C. § 102(b) rejection is respectfully requested.

### **CONCLUSION**

Applicants submit the application is in condition for allowance, and an early notice to that effect is requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-37101/BNK.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Erik A. Heter', is written over a horizontal line.

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